

201-15708



"Rusch, George"
<george.rusch@honeywell.com>

To Karen Hoffman/DC/USEPA/US@EPA

12/01/2004 10:11 AM

cc

Subject RE: Question on CAS 105-60-2

Dear Ms. Hoffman,

I can well understand your confusion. Originally the IHF was sponsoring caprolactam CAS # 105-60-2). The members of the consortium were as you indicated. However, BASF in Europe had also agreed to sponsor caprolactam under ICCA. As they had prepared the SIDS dossier, the consortium agreed to pay BASF a nominal fee for that activity and have BASF submit the dossier. I believe that the dossier was submitted to Germany under ICCA and has been reviewed by OECD. The members of the consortium viewed this as having completed the HPV dossier submission requirement. If there were questions from the reviewers, I assume BASF has addressed these.

Sincerely,
George M. Rusch
Director of Toxicology and Risk Assessment
Honeywell International

-----Original Message-----

From: Hoffman.Karen@epamail.epa.gov
[mailto:Hoffman.Karen@epamail.epa.gov]
Sent: Wednesday, December 01, 2004 9:49 AM
To: george.rusch@honeywell.com
Subject: Question on CAS 105-60-2

Dear Mr. Rusch:

I am writing you to clear up some confusion we have regarding CAS 105-60-2. Currently in our database, we have the Industrial Health Foundationa (IHF Committee on Nylon 6 and its Precursors) comitted to sponsoring Caprolactam based on a November 23, 1999 letter and a January 11, 2000 follow-up letter from IHIF. However, since we heard that the IHF is no longer in existence, we would like to understand what should happen to this commitment and would appreciate your help.

The IHF Nylon 6 consortia members (according to the consortia itself) were BASF Corporation, Bayer AG Corporation, DSM Chemicals North America, Inc., and Honeywell International Inc.

BASF maked its commitment to the CAS through IHF in a November 30, 1999 letter. BASF also commits to the CAS through ICCA in the Verband letter of October 28, 1999 and through ICCA in a November 29, 2001 letter as part of the e-Caprolactam Consortium.

Bayer AG Corporation made its commitment to the CAS through IHF in a January 5, 2000 letter. Bayer AG also commits to the CAS through ICCA in the Verband letter of October 28, 1999.

DSM Chemicals North America, Inc. made its commitment to the CAS through IHF in a November 17, 1999 letter and than changed its

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commitment to Verband in ICCA.

HONEYWELL International Inc. made its commitment to the CAS through IHF in a November 22, 1999 letter and no other communication has been received. Are you still sponsoring this CAS number and if so, are you sponsoring it through the Verband in ICCA? Or is Honeywell sponsoring it in the HPV Challenge Program? If Honeywell is sponsoring it through the Verband in ICCA, is the consortium still made up of BASF, BAYER, DSM and Honeywell?

We very much appreciate your help and thank you very much.

Karen Hoffman

HPV Challenge Program

Environmental Protection Agency